

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

~ VS ~

RAUL TORRES,

Defendant.

CASE NO.: 1:19-CR-00390

JUDGE DONALD C. NUGENT

DEFENDANT RAUL TORRES'  
UNOPPOSED MOTION FOR  
PERMISSION TO TRAVEL TO PUERTO  
RICO FROM AUGUST 21, 2019  
THROUGH AUGUST 29, 2019

Now comes the Defendant, **Raul Torres**, by and through his undersigned counsel, and respectfully requests this Honorable Court issue an Order granting Defendant permission to travel to Puerto Rico from August 21, 2019 through August 29, 2019, for the following reasons:

1. On July 3, 2019, Defendant Torres appeared for an Arraignment and Change of Plea Hearing related to the Information filed on June 25, 2019. The Defendant plead guilty to the Information, waived Indictment, signed a Plea Agreement and was referred to the Pretrial Services and Probation Department for a Presentence Investigation Report. An Appearance Bond was entered in the amount of \$20,000.00 unsecured and Defendant's Sentencing Hearing was set for October 9, 2019.

2. The Defendant has been compliant with all conditions imposed by the Government since receiving Assistant United States Prosecuting Attorney Matthew Cronin's August 3, 2018 "Target Letter".

3. The Defendant has made arrangements to travel with his immediate family, if allowed, to Puerto Rico for the purpose of visiting close family members, prior to the commencement of his prison sentence. (See: Itinerary, Car Rental and AirBNB confirmations, attached).

4. Mr. Torres has previously surrendered his United States Passport.

5. Prior to submitting this Motion, defense counsel obtained Assistant United States Attorney Matthew Cronin's consent to file this request with no opposition.

**WHEREFORE**, for the above reasons, Defendant Raul Torres respectfully requests this Court issue an Order permitting him to travel to Puerto Rico from August 21, 2019 through August 29, 2019, to vacation with his family prior to his October 9, 2019 Sentencing Hearing and the commencement of his prison sentence.

Respectfully submitted,

*/s/ - Michael J. Goldberg*  
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Counsel for **DEFENDANT RAUL TORRES**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of July, 2019, a copy of the foregoing has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/ - Michael J. Goldberg*  
**MICHAEL J. GOLDBERG, ESQ.**